

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

ROOT, INC., et al., : **Case No.: 2:23-cv-00512**

Plaintiffs, : **Judge Sarah Morrison**

v. :

BRINSON CALEB “BC” SILVER, et :
al.,

Defendants.

AGREED MOTION FOR EXTENSION OF TIME TO MOVE OR PLEAD

Defendants, Brinson Caleb “BC” Silver, Eclipse Home Design, LLC and Collateral Damage, LLC (“Defendants”) hereby respectfully move this Court for an extension of time, up to and including May 4, 2023, to answer, move, or otherwise respond to Plaintiff’s Amended Complaint. This request is not made for the purpose of delay and is intended to allow sufficient time for Defendants to review the claims and determine appropriate responses. Defendants have not requested nor received any prior extensions and Plaintiff has indicated it does not object to this request.

Accordingly, Defendants respectfully move for an extension of time to move or plead, up to and including May 4, 2023.

Respectfully submitted,

/s/ Aaron M. Jones

David M. Scott (0068110)

Aaron M. Jones (0096386)

BRENNAN, MANNA & DIAMOND, LLC

250 S. Civic Center Dr., Ste. 300

Columbus, Ohio 43215

Telephone: (614) 246-7500

E-mail: dscott@bmdllc.com

amjones@bmdllc.com

Attorneys for Defendants Brinson Caleb "BC"

Silver Eclipse Home Design, LLC and

Collateral Damage, LLC

Approved by:

/s/ William D. Kloss, Jr. (per auth. 4.6.23)

William D. Kloss, Jr. (0040854), Trial Attorney

Elizabeth S. Alexander (0096401)

Grace E. Saalman (0101603)

VORYS, SATER, SEYMOUR AND PEASE LLP

52 East Gay Street, P.O. Box 1008

Columbus, Ohio 43216-1008

Phone: (614) 464-6360 Fax: (614) 719-4807

wdklossjr@vorys.com

esalexander@vorys.com

gesaalman@vorys.com

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of April 2023, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

A copy was also sent by ordinary U.S. Mail, postage prepaid, to the following:

Paige McDaniel
5576 Alexanders Lake Road
Stockbridge, GA 30281

/s/ Aaron M. Jones

Aaron M. Jones (0096386)